

# WORK REQUEST

1250k

Request Date: 12-12-86

Originator: Barucki

Date Required: 12-17-86

Form:      Final      Semi-Final

Draft

Special Instructions Typing: \_\_\_\_\_

\_\_\_\_\_

## Correspondence Instructions

☐ - cc's

Discribe Enclosures: \_\_\_\_\_

☐ - bcc's

\_\_\_\_\_

☐ - cc/bcc addresses included

\_\_\_\_\_

☐ - Enclosures

Special Instructions Mailing and/or Copying: \_\_\_\_\_

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CREATA NEW

~~Boiler Plate~~

"K" Doc. Superscopy → 1196 K - will have  
to be superscribed

M/S 613

1250k

Re: TSCA No. \_\_\_\_\_

Dear \_\_\_\_\_:

On July 16, 1986, the Environmental Protection Agency (EPA) inspected Seattle Iron and Metals Corporation facility at Harbor Island in Seattle, Washington. That inspection revealed the presence of significant amounts of polychlorinated biphenyls (PCBs) in samples taken at various locations at the site.

To further EPA's investigation of Seattle Iron and Metals located at 2955 11th Ave SW in Seattle, we have enclosed a subpoena duces tecum and subpoena ad testificandum with this letter. Pursuant to Section 11(c) of the Toxic Substances Control Act (TSCA), the subpoena requires submitting certain documents and answering a number of questions regarding activities at Seattle Iron and Metals. Failure to respond to the subpoena could subject you to contempt of court proceedings in Federal District Court.

The enclosed subpoena provides you the opportunity of submitting the requested documents and information by mail in lieu of attending in person, provided that the documents, and other information requested, are produced at or before the date required by the subpoena.

Sincerely,

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Assistant Regional Counsel

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 10, 1200 Sixth Avenue

Seattle, Washington 98101

IN THE MATTER OF:

No. \_\_\_\_\_

SEATTLE IRON and Metals CORP.

SUBPOENA DUCES TECUM AND

SUBPOENA AD TESTIFICANDUM

TO: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



YOU ARE HEREBY COMMANDED, pursuant to the provisions contained in Title 15,

United States Code, Section 2610(c) [Toxic Substances Control Act Section

11(c)] TO BE AND APPEAR IN PERSON at the following place:

TIME AND DATE:

PLACE:

Offices of the Environmental Protection Agency

Region 10, Room 12B, 12th Floor

Park Place Building

1200 Sixth Avenue

Seattle, Washington 98101

(206) 442- \_\_\_\_\_

YOU ARE COMMANDED FURTHER:

TO TESTIFY then and there upon oath and MAKE TRUTHFUL RESPONSE to all lawful inquiries and questions then and there put to you on behalf of the United States Environmental Protection Agency; and

TO REMAIN IN ATTENDANCE until expressly excused by the attorney conducting the proceeding for EPA; and

TO BRING WITH YOU at the above stated place and time, and then and there produce for inspection and/or copying, those items identified and described on the ATTACHED PAGE (if any page be attached).

FAILURE TO COMPLY WITH THIS SUBPOENA MAY RESULT IN COURT PROCEEDINGS AGAINST YOU IN A UNITED STATES DISTRICT COURT.

Issued at Seattle, Washington, this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_.

Attorney Contact:

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ROBIE G. RUSSELL

Regional Counsel

Regional Administrator, EPA Region 10



I. INSTRUCTIONS

1. This subpoena covers all documents described below in your possession, control, or custody, relating to the period of time during which you *[have owned or operated] [have been or were employed at]*  
*Seattle Iron and Metals Corp., 2955 11th Ave SW in Seattle, Washington*

2. For the purpose of complying with this subpoena, the word "document" means the original or a true, correct, and complete copy and all non-identical copies of any report, paper, note, letter, correspondence, memorandum, study, data compilation, circular, work sheet, minutes, test result, laboratory note or memorandum, analysis or other transcription of information, whether written, typed, printed, recorded on tape, microfilm, or other device, regardless of whether circulated within the company or to outsiders, regardless of whether generated within or without the company, and regardless of whether in the possession of your company or any agent acting in its behalf.

3. Each document submitted shall be clearly and precisely identified as to its title, author, date of preparation, and subject matter.

4. If neither the original nor a copy of any requested document is currently in the possession or control of you or your company for ~~any~~ reason, identify the document by date, title, subject matter, the name of individuals who prepared and received it and the name and address of the person who currently has possession or control of that document. If the document no longer exists, explain why. If the document has been destroyed, identify the name of the individual who ordered it destroyed, when the order was issued, and why.



5. The authority under which this subpoena is issued, 15 U.S.C. §2610(c), authorizes the Administrator to require answers to questions as well as the submittal of documents. Answer all questions completely. Where necessary, documents may be submitted to answer all or part of any questions asked in these Specifications.

## II. Information Requested

- # For what period of time were you/have you been employed by Seattle Iron & Metals? What was/is your job?*
- # Where were transformers stored on site? When? What were the receiving, handling, shipping, and disassembly procedures for transformers? Where were they taken apart? Did they contain oil or liquids?
- # Where were oils stored on site? When? How were used oils handled?
- # What chemicals were used on site? When? Where? How were spent chemicals handled?
- # Were there any spills on site? When? Where? What? How was the cleanup handled?

*do not include this  
info in boilerplate*

- # Where was the quench tank on site? What was it used for? Where was it used? What was the procedure for use? Was the tank drained or pumped at any time? How? Was it even filled with water? How often? How was the discharge handled? How was the termination of use and disposal handled?
- # Where were electric trains dismantled? Were the transformers ever still inside? How was the oil in the drip pans handled?
- # What was the work flow in the yard during your work experience? Did it change? Were any piles moved? Did the locations of work ever change? How often? What were the general policy and procedure rules? How were they communicated? Was open burning an accepted procedure? Did you save any written memoranda, etc.?
- # Is there anything ~~the employee~~<sup>you</sup> thinks ~~the EPA and Ecology~~<sup>government</sup> need<sup>s</sup> to know to protect the environment?

do not include  
in boiler plate

Continue w/ questions on  
next page



- #. For what period of time have you owned/operated Seattle Iron and Metals?
- #. Provide all documents in your possession showing purchase of liquid-filled or drained electrical equipment, including transformers, capacitors, and any other similar piece of equipment. Provide any information you have for this equipment such as manufacturer, type, size, rating, serial numbers, dielectric fluid, PCB content, etc.
- #. Provide any documents not included above that identify all companies, facilities, persons, or other sources from which you obtained liquid-filled or drained electrical equipment.
- #. Provide a written description of transformer and capacitor handling practices with storage sites and dates.
- #. Provide all documents in your possession showing sales and purchases of waste and hydraulic oils.
- #. Provide a list of your sources of scrap metal.
- #. Provide a written description of your past and current handling practices, including any burning, for scrap metals, batteries, aluminum dross, copper, ash, and unreclaimable materials. Provide a map showing storage and handling locations and dates.
- #. Provide a written description of the use and history of the quench tank, including locations.
- #. Provide a written description of all discharge points past and present with maps and dates.
- #. Provide a list of all employees past and present.
- #. Provide a list of all commercial properties that you or the other owners of Seattle Iron and Metals own or control in whole or in part.
- #. Provide a list of all subsidiaries of Seattle Iron and Metals with address, nature of business, date of purchase, and former owner.
- #. Provide a list of all business associations to which you or the other owners of Seattle Iron and Metals belong, and the date of all elected offices held by you or the other owners of Seattle Iron and Metals.